

Meeting Minutes
Inter Agency Management Integration Team (IAMIT)
EPA Conference Room
712 Swift Blvd., Richland
March 24, 1998

Appvl.: *Jackson E. Kinzer* Date: 4-28-98
Jackson E. Kinzer, RL (S7-50)
IAMIT Representative

Appvl.: *Douglas R. Sherwood* Date: 4/28/98
Douglas R. Sherwood, EPA (B5-01)
IAMIT Representative

Appvl.: *Michael A. Wilson* Date: 4/28/98
Michael A. Wilson, Ecology (B5-18)
IAMIT Representative

Prepared by *Mary Ann McLaughlin* Date: 4-28-98
Appvl.: *Larry D. Arnold*
Larry D. Arnold (G3-27)
Fluor Daniel Hanford, Inc.

Distribution

Arnold, L. D.	FDH	G3-27	Rasmussen, J. E.	RL	A5-15*
Blazek, M. L.	ODOE	Oregon	Sanders, G. H.	RL	A5-15*
Cusack, L.	Ecology	B5-18*	Sherwood, D. R.	EPA	B5-01*
Dietz, L. A.	BHI	H0-20	Stanley, R.	Ecology	Lacey*
Farabee, A.	RL	R3-79	Wilson, M. A.	Ecology	B5-18*
Hughes, E. J.	RL	R3-79	Yerxa, J. K.	RL	A5-15
Miera, F. R.	RL	A5-15*	EDMC		H6-08

* W/Attachments

IAMIT03.24

RECEIVED
JUN 03 2004

EDMC

Inter Agency Management Integration Team
EPA Conference Room
712 Swift Blvd., Richland
March 24, 1998

A. FFTF Response to Public Comments

Ernie Hughes, DOE-RL, reported that there have been 1,215 commenters and discussed the plan to produce a draft Response To Public Comments document on the FFTF tentatively agreed changes.

Information to be included:

Appendix A - Tally of comments with names and numbers

Appendix B - Copies of each letter, electronic mail or post card received

Appendix C - Letters/PostCards addressed to Governor Locke
- Letters/PostCards addressed to Secretary Peña
- Letters/PostCards received after close of public comment period.

The draft response to public comments will be provided to Ecology for review and to address how to respond. Future meetings will be scheduled with the regulatory agencies to work on this activity.

Tape transcripts related to FFTF from Hanford Advisory Board meetings are still under review.

B. Waste Information Data System (WIDS)

Nancy Werdel, DOE-RL presented a Tri-Party Agreement Handbook Management Procedure, TPA-MP-14 (document number RL-TPA-90-001) "Maintenance of the Waste Information Data System." Figure 2-1 "Waste site Classification/Reclassification Flow Diagram" was discussed at length. It was stated that all comments had been resolved between the three parties. Concurrence between the three agencies was acknowledged and the Management Procedure was approved (Attachment 1).

C. Tri-Party Agreement Appendix C Update

A draft Tri-Party Agreement Change Request for updating Appendix C was presented to the IAMIT. It was stated that CERCLA paragraph 120e calls for all releases to be listed in the Hanford Federal Facility Agreement and Consent Order. A decision to incorporate a proposed change request will be addressed during future IAMIT meetings. The EPA is in agreement with the proposed schedule for updating Appendix C and ensuring all waste sites are captured. Project Managers are to review the proposed change request and recommend approval/disapproval.

3/24/78

IANET AGENDA

- 1,215 minutes

A) - Series Hughes OCE-RL discussed plan to
produce draft I.T.P. Document on FETF Program.

Appendix A - F-Section
TPA-8

14 OTHERS

B- Copies of each letter /

E-MAIL - Post Card

Letters / Post Cards to

C- JON LOCKE

TO BE addressed

opening section

- Review

- other issues out standing

Send to State - review address

how to proceed, future meetings

will be scheduled.

B) HAB - FETF

Topic tomorrow will still proceed class.

3/24/98

WIDS Information Data Systems

Nancy WERDEL DOE/RL presented a

draft document Number - EL-TPA-90-001

Figure 2-1 was discussed, involved

all comments between the three parties.

all three parties agreed and signed the procedure.

- TPA Appendix "C" Update - a draft

TPA C/R for changing Appendix "C"

was presented to the TPA Parties.

CERCLA 120c - calls for all releases to

be listed to the H.F.F.C.O. a decision

its incorporation proposed C/R will be

addressed during future IAWIT meetings.

EPA is in agreement with ^{revised} schedule of

Appendix "C" and requires all waste

sites are identified. Project managers

to review proposed C/R and recommend

approval. Status of proposed C/R

to be presented to the IAWIT during

April 1998.

ADWEL
WARTS
CIR

12/31/97
10/1/300 days
Project plan
2345-

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

DATE: 3/24/98

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>Felix R. Miera</u>	<u>RL/EAP</u>	<u>AS-15</u>	<u>✓</u>
<u>Jon Yerra</u>	<u>RL/EAP</u>	<u>AS-15</u>	
<u>AL Farabee</u>	<u>RL/SPO</u>		
<u>Ernie Hughes</u>	<u>RL/SPO</u>		
<u>ROGER STANLEY</u>	<u>Ecology</u>		<u>✓</u>
<u>LAURA Cusack</u>	<u>Ecology</u>		<u>✓</u>
<u>Doug Sherwood</u>	<u>EPA</u>	<u>B5-01</u>	<u>✓</u>
<u>MIKE WILSON</u>	<u>ECOLOGY</u>		<u>✓</u>
<u>Jim Rasmussen</u>	<u>DOE/ESH</u>	<u>AS-15</u>	<u>✓</u>
<u>Larry Amodeo</u>	<u>FOH/TPAI</u>		
<u>Inda Nietz</u>	<u>BHI</u>	<u>HQ-20</u>	

AGENDA
INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

MARCH 24, 1998
1:00 PM - 2:00 PM

EPA CONFERENCE ROOM
712 SWIFT BLVD., SUITE 5

(CHAIRPERSON: D. R. SHERWOOD)

1:00 pm FFTF RESPONSE TO COMMENTS AND M-81 CHANGE PACKAGE DISCUSSION
(R. Almquist, A. Farabee, R. Stanley)

1:30 pm WASTE INFORMATION DATA SYSTEM - PROCEDURE AND APPENDIX C CHANGES
(N. Werdel, K. Holliday, D. Einan)

2:00 pm ADJOURN

IMAGENDA.MAR

BRIEFING NOTES
for the March 24, 1998 IAMIT Meeting

NEGOTIATIONS FOLLOWUP - Fast Flux Test Facility (FFTF)

The FFTF is currently in a standby condition while the DOE evaluates the possible use of the reactor to produce tritium for national defense (an issue which has proven especially sensitive with certain segments of the public). Currently the FFTF has enforceable milestones in the Tri-Party Agreement related to its deactivation and transition. A Tentative Agreement was approved on October 14, 1997 by the three Parties containing a Tri-Party Agreement change request which when fully approved will delete all FFTF milestones. A public comment period and associated public meetings have been conducted with a large number of comments received from the public. Currently, responses to the public comments are being drafted and must be approved by the DOE, EPA and Ecology prior to final approval of the FFTF change request. The IAMIT is expected to discuss the steps necessary to reach final approval of the change request.

FDH responsible personnel: Bruce Klos

WASTE INFORMATION DATA SYSTEM (WIDS) - PROCEDURE AND APPENDIX C CHANGES

The WIDS database is maintained by the Environmental Restoration Division of the DOE through it's Environmental Restoration Contractor, Bechtel Hanford Incorporated. WIDS is used to track all waste sites which will require investigation and possibly remediation on the Hanford Site. The WIDS has recently undergone a major updating related to sites in the 100 areas. A procedure for controlling the updating (adding and removing of sites from the database) has also been worked out with the EPA and Ecology. A change request which would remove the detailed listing of sites from the Tri-Party Agreement has also been developed since the listing in the Tri-Party Agreement is redundant to the WIDS efforts. The DOE is expected to seek IAMIT approval of the procedure and the change request to the Tri-Party Agreement.

[854] From: Ronald D (Ron) Morrison at ~HANFORD09C 3/20/98 1:41PM (4240 bytes: 5
6 ln, 1 fl)

To: Rodney A Almquist at ~HANFORD16D, David R Einan at ~HANFORD02A,
Oliver A (Al) Farabee at ~HANFORD16D, Keith K Holliday at ~HANFORD02A,
Ernest J Hughes at ~HANFORD16D, Jackson E (DOE) Kinzer at ~EXCHANGE,
E S II (Skip) McGinley at ~EXCHANGE, James E (Jim) Rasmussen at ~HANFORD14A,
George H Sanders at ~HANFORD14B, Doug R Sherwood at ~HANFORD02A,
Roger F Stanley at Ecology Lacey, Nancy A Werdel at ~HANFORD19A,
Michael A (Mike) Wilson at Ecology Lacey, Michael K (Mike) Yates at
~HANFORD01E

cc: Ronald D (Ron) Morrison, Joy M Kinmark at ~HANFORD02A, Laura J Cusack at
~HANFORD02A

Subject: March 24, 1998 Tri-Party Agreement IAMIT Meeting Agenda.

----- Message Contents -----

Text item 1:

Distribution list 1 of 3.

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(N. Werdel, K. Holliday, D. Einan)

2:00 pm ADJOURN

[855] From: Ronald D (Ron) Morrison at ~HANFORD09C 3/20/98 1:43PM (5576 bytes: 5
6 ln, 1 fl)

cc: William D (Bill) Adair at ~HANFORD08A, Steven M Alexander at ~HANFORD02A,
Linda K Bauer at ~HANFORD19A, Roger C Bowman at ~EXCHANGE, Phillip R Brobst at
~HANFORD01B, Clifford E (Cliff) Clark at ~HANFORD22B, Laura J Cusack at
~HANFORD02A, Suzanne L Dahl-crumpler at ~HANFORD02A, Bradley G Erlandson at
~HANFORD24A, Dennis A Faulk at ~HANFORD02A, Christine E Goody at ~EXCHANGE,
Judith W Graybeal at ~HANFORD09A, George C III Henckel at ~BHI000,
Andrea M Hopkins at ~HANFORD16D, Michael C Hughes at ~BHI000, Joy M Kinmark at
~HANFORD02A, David B (Bruce) Klos at ~EXCHANGE, Owen S Kramer, Sheila K Little
at ~HANFORD21D, Ellen M Mattlin at ~HANFORD14A, Carl G (Gus) Mattsson at
~HANFORD16D, Ronald D (Ron) Morrison, Nancy B Myers at ~BHI000,
L J (Larry) Olguin at ~HANFORD16A, David E Olson at ~HANFORD19A,
Edward W Jr Penn at ~HANFORD01D, Jon C Peschong at ~HANFORD05C, Susan M Price
at ~EXCHANGE, Noel J (John) Rayner at ~BHI000, Lynne R Roeder-Smith at
~HANFORD19B, Fred A III Ruck at ~EXCHANGE, E R (Ron) Skinnarland at
~HANFORD07B, V L (Vikki) Wagner at ~HANFORD07C, Barbara D Williamson at
~HANFORD01C, Patrick W Willison at ~HANFORD22A, Thomas M Wintczak at ~BHI000,
Theodore A Wooley at ~HANFORD02A, Jon K Yerxa at ~HANFORD14A

Subject: March 24, 1998 Tri-Party Agreement IAMIT Meeting Agenda.

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[856] From: Ronald D (Ron) Morrison at ~HANFORD09C 3/20/98 1:48PM (5027 bytes: 5
6 ln, 1 fl)

cc: Cindy L Anderson at ~HANFORD19A, Larry D Arnold, Becky A Austin at
~HANFORD01D, Walter R (Russ) Brown at ~HANFORD09A, Drusilla H (Dru) Butler at
~HANFORD01D, Laura J Cooper at ~EXCHANGE, Laura J Cusack at ~HANFORD02A,
Audrey D Dove at ~HANFORD02A, Krena G Eldhardt at ~HANFORD18E,
Geneva Ellis-balone at ~HANFORD14E, R S Hajner at ~BHI000, Kathryn M Hintzen
at ~HANFORD14B, Richard A Holten at ~HANFORD19A, Dale E Jackson at
~HANFORD14A, Joy M Kinmark at ~HANFORD02A, Steven D Liedle at ~BHI000,
Thomas E Logan at ~BHI000, Carol G Lowery at ~HANFORD01E, Tammie A McClure at
~HANFORD07E, M A (Mary Ann) McLaughlin, James E Mecca at ~HANFORD04C,
Estella (Stella) Mendoza at ~EXCHANGE, Felix R Miera at ~HANFORD14A,
Ronald D (Ron) Morrison, C D (Cathy) Poynor at ~EXCHANGE, Leah A Sakach at
~HANFORD19A, John P Sands at ~HANFORD08E, Marc W Stevenson,
K M (Mike) Thompson at ~HANFORD19A, Ruthann S Townsend at ~HANFORD02C,
Larrie K Trent at ~HANFORD01A, Janice D Williams at ~HANFORD07E

Subject: March 24, 1998 Tri-Party Agreement IAMIT Meeting Agenda.

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IMAGE

[861] From: Ronald D (Ron) Morrison at ~HANFORD09C 3/20/98 3:25PM (2548 bytes: 6
ln, 1 fl)
To: mary.l.blazek@state.or.us at -MailLink, steven.p.sautter@state.or.us at
-MailLink
cc: Felix R Miera at ~HANFORD14A, Ronald D (Ron) Morrison
Subject: March 24, 1998 Tri-Party Agreement IAMIT Meeting Agenda.
----- Message Contents -----

Text item 1:

Mary Lou, Steve,

Attached is the agenda for the March 24,
1998 Tri-Party Agreement Inter Agency Management Integration
Team (IAMIT) Meeting. Time and place are on the agenda.

Ron Morrison

[862] From: Ronald D (Ron) Morrison at -HANFORD09C 3/20/98 3:31PM (3239 bytes: 5
9 ln, 1 fl)
To: aaacarlso@aol.com at -MailLink, Gail M McClure at -EXCHANGE
bcc: Ronald D (Ron) Morrison
Subject: March 24, 1998 Tri-Party Agreement IAMIT Meeting Agenda.
----- Message Contents -----

Text item 1:

Here and attached as a WP 5.1 file is the March 24, 1998
IAMIT agenda.

Ron M.

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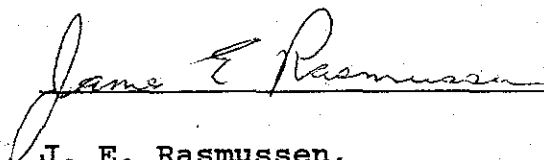
1:30 pm WASTE INFORMATION DATA SYSTEM - PROCEDURE AND APPENDIX C CHANGES
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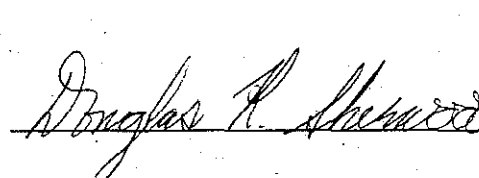
2:00 pm ADJOURN

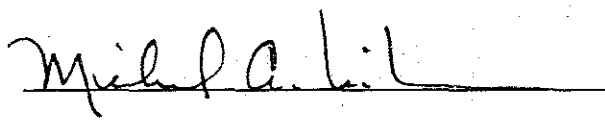
TRI-PARTY AGREEMENT HANDBOOK
MANAGEMENT PROCEDURES

Document Number RL-TPA-90-0001
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Maintenance of the Waste
Information Data System
(WIDS).


J. E. Rasmussen,
IAMIT Representative
U.S. Department of Energy


D. R. Sherwood,
IAMIT Representative
Environmental Protection
Agency


M. A. Wilson,
IAMIT Representative
State of Washington Department
of Ecology

1.0 PURPOSE

This procedure establishes the responsibilities and steps required to maintain and update the Hanford Site Waste Information Data System (WIDS) by adding new sites, updating information on existing sites, and reclassifying existing sites (waste management units).

This procedure also describes the process to assess and document information concerning new sites, new information on existing sites, reclassifying existing sites, and incorporating this information into WIDS. This process is consistent with the sitewide, ongoing scoping activity discussed in Subsection 7.2.1 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan. Reclassifying existing waste

Not Notarized

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management units is consistent with the assessment that would be conducted under a *Resource Conservation and Recovery Act of 1976* (RCRA) Facility Assessment (RFA) or *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA) Preliminary Assessment/Site Inspection (PA/SI). Reclassification and evaluation of waste management units under this procedure would provide information that could be used to support the preparation of an RFA report.

1.1 DEFINITIONS

Accepted Site: An assessment that the site is a waste management unit as defined in the Tri-Party Agreement Section 3.0. (Source: BHI-0093 Rev. 0. Waste Information Data System Data Field Definitions and Criteria, Appendix A Terms and Definitions)

Administrative Record: The administrative record is the body of documents and information that is considered or relied upon in arriving at a final decision for a remedial action, interim response action (i.e., removal action), corrective measure, interim measure, RCRA permit, or approved RCRA closure plan. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund: The federal statute enacted in 1980 and reauthorized in 1986, which provides the statutory authority for cleanup of hazardous substances that could endanger public health or welfare or the environment. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

CERCLA Past Practice (CPP): A process by which a past practice unit containing hazardous substances will be addressed for response action. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

Closed Out: An assessment that the waste management unit now meets cleanup standards or other regulatory authority.

Discovery Site: Evidence of the potential existence of a waste site; assessment not yet complete. (Source: BHI-0093 Rev. 0.

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Waste Information Data System Data Field Definitions and
Criteria, Appendix A Terms and Definitions)

Inactive Contaminated Structures: Permanent, man-made features including buildings, concrete piers and supports, foundations and slabs, diversion boxes, control structures, tanks, flush pits, outfalls, pump stations, reactors, stacks, sumps, and valve pits that have no current or planned future use and have surfaces contaminated with hazardous substances or have hazardous substances remaining within them. Inactive contaminated structures do not include waste disposal facilities such as cribs, ponds, ditches, burial grounds, landfills, and french drains. (Source: BHI-0093 Rev. 0. Waste Information Data System Data Field Definitions and Criteria, Appendix A Terms and Definitions)

Interagency Management Integration Team (IAMIT): A committee of the Executive Managers from each agency (U.S. Department of Energy, Richland Operations Office (DOE), U.S. Environmental Protection Agency, Region X (EPA), and the Washington State Department of Ecology (Ecology)) with the functions of negotiation of new milestones, adjustment of scope and schedule of existing interim milestones, and Tri-Party Agreement Issue Resolution/Dispute Resolution. The IAMIT also serves as the interface with the Hanford Advisory Board (HAB). (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A.)

No Action: A determination that the site does not require action under RCRA Corrective Action, CERCLA, or other regulatory authority.

Operable Unit: A discrete portion of the Hanford Site, as identified in Section 3.3 of the TPA Action Plan for Implementation of the Hanford Consent Order. An operable unit at Hanford is a group of land disposal sites placed together for the purposes of doing a Remedial Investigation/Feasibility Study (RI/FS) and subsequent cleanup actions. The primary criteria for placement of a waste management unit into an operable unit includes geographic proximity, similarity of waste characteristics and site type, and the possibility for economies of scale. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

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Other Storage Areas: Areas that are used to store materials that are not permitted under the Resource Conservation and Recovery Act. Only those other storage areas that may require action to mitigate a potential environmental impact are eligible as waste management units per the Tri-Party Agreement. (Source: BHI-0093 Rev. 0. Waste Information Data System Data Field Definitions and Criteria, Appendix A Terms and Definitions)

Preliminary Assessment and Site Inspection (PA/SI): Normally the first step in analyzing the nature and severity of contamination at a potential CERCLA site and is used to determine if a site should be nominated for the NPL. Based upon extensive documentation previously submitted to EPA by DOE, this requirement is considered to have been satisfied for the Hanford Site. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

Project Manager: The individual responsible for implementing the terms and conditions of the Agreement at the specific operable unit level on behalf of his/her respective Party. The project manager has direct responsibility for completion of targets and milestones and has authority to agree to modifications of scope and schedule, in accordance with Section 12.0 of the Action Plan. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

Project Managers' Status Package: The status package contains a list of sites that are proposed to be rejected during that given month and a list of sites in the discovery classification for more than 6 months. For each site listed, the WIDS discovery site evaluation checklist and general summary sheet for the site(s) undergoing review shall also be included.

Resource Conservation and Recovery Act (RCRA): A federal law enacted in 1976 that regulated the generation, transportation, treatment, storage, and disposal of hazardous wastes. (Source: Tri-Party Agreement Handbook, RL-TPA-90-0001, Appendix A)

RCRA Facility Assessment (RFA): The initial RCRA process to determine whether corrective action for a RCRA past practice unit (waste management unit) is warranted, or to define what additional data must be gathered to make this determination;

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analogous to a CERCLA Preliminary Assessment and Site Inspection. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

RCRA Past Practice (RPP): A process by which a past practice unit (waste management unit) containing hazardous wastes or hazardous constituents will be addressed for corrective action, regardless of the date waste was received or discharged at a unit. (Source: Federal Facility and Consent Order (TPA), 89-10 Appendix A)

Reclassification: A process of changing the status of an accepted waste management unit to one of rejected, no action, closed out, or deleted from NPL. This classification requires regulatory agency review and concurrence. Additionally, new information about a site that already exists in WIDS could result in changes to waste site classifications; to categories in WIDS (i.e., waste types); or to site historical information.

Rejected Site: (a) (For discovery sites) An assessment that the site is not a waste management unit and not within the scope of TPA Section 3.0. This classification requires regulatory agency review and concurrence. (b) (For reclassified sites) An assessment that the site is not a waste management unit and there is no evidence of an actual or potential hazardous substance release. This classification requires regulatory agency review and concurrence. (Source: BHI-0093 Rev. 0. Waste Information Data System Data Field Definitions and Criteria, Appendix A Terms and Definitions)

Scoping Activities: There is an ongoing activity to maintain a current list of operable unit boundaries. WIDS is the vehicle for maintaining the current list. Changes to waste management units may impact operable unit boundaries and require written concurrence of the DOE and lead regulatory agency. (Source: Federal Facility and Consent Order (TPA), 89-10 Section 7.2.1)

Solid Waste Management Unit (SWMU): Any discernible location at a facility, as defined for the purposes of corrective action, where solid wastes have been placed at any time, irrespective of whether the location was intended for the management of solid or dangerous waste. Such locations include any area at a facility

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at which solid wastes, including spills, have been routinely and systematically released. (Source: Washington Administrative Code (WAC) 173-303-040)

Source, Special Nuclear, or Byproduct Material: The term "source material" means uranium or thorium. The term "special nuclear material" means plutonium, uranium enriched in the isotope 233 or in the isotope 235. The term "byproduct material" means any radioactive material yielded in or made radioactive by exposure to the radiation incident in the process of producing or utilizing special nuclear material. (Source: 42 USC Section 2014 Chapter 23 Development and Control of Atomic Energy)

Treatment, Storage, or Disposal (TSD): A RCRA term referring to the treatment, storage, or disposal of hazardous waste. Under RCRA, TSD activity can occur only at units that received or stored hazardous waste after November 19, 1980, the effective date of the RCRA regulations. (Source: Federal Facility and Consent Order (TPA), 89-10 Section 3.1)

Waste Disposal Unit: For purposes of determining the TPA waste management unit type, waste disposal units are those that are either permitted for the disposal of dangerous waste or other units used for disposal including burial grounds, pits, ponds, ditches, cribs, trenches, french drains, or land surface units that may require action to mitigate a potential environmental impact. (Source: BHI-0093 Rev. 0. Waste Information Data System Data Field Definitions and Criteria, Appendix A Terms and Definitions)

Waste Management Unit: Any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact. (Source: Federal Facility and Consent Order (TPA), 89-10 Section 3.1)

WIDS Database Administrator: Also known as Database Administrator throughout this procedure, is the individual responsible for the maintenance of the WIDS.

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2.0 SCOPE

This procedure addresses maintenance of WIDS, as required by the Tri-Party Agreement (Subsection 3.5). WIDS identifies waste management units on the Hanford Site and summarizes information associated with each unit. The <90 day storage areas and satellite accumulation areas will be maintained on a separate list as documented in the operating record per Condition II.I.1.a of the Hanford Facility Wide RCRA Permit.

The Tri-Party Agreement defines a waste management unit as any location within the Hanford Site boundary that may require action to mitigate a potential environmental impact. This would include all solid waste management units (SWMU) specified under Section 3004(u) of RCRA. The State of Washington defines SWMUs in their Dangerous Waste Regulations (WAC 173-303-040) as "any discernible location at a facility, as defined for the purposes of corrective action, where solid wastes have been placed at any time, irrespective of whether the location was intended for the management of solid or dangerous waste. Such locations include any area at a facility at which solid wastes, including spills, have been routinely and systematically released". Those waste management units which meet the WAC definition of SWMU will be so designated in WIDS.

This procedure should be used when any of the following occurs:

- A potential new site is discovered. This includes unplanned releases that represent a potential threat to human health and the environment. Classification categories for newly discovered sites are listed in Table 2-1. Unplanned releases are considered waste management units, and will not be classified as SWMUs, as they do not meet the condition of routinely and systematically released.
- New information about a site that already exists in WIDS. This new information could result in changes to site classifications; to categories in WIDS (i.e., waste types); or to site historical information. Waste site reclassification categories are listed in Table 2-2.

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- Determinations are made in appropriate decision documents (i.e., for RCRA treatment, storage, and disposal [TSD] closures, remedial actions, or no further action determinations) that require reclassification of waste management units. Examples of reclassification actions are given in Table 2-3.

Figure 2-1 shows the progression of sites through the WIDS decision process and the classification and reclassification results.

3.0 RESPONSIBILITIES

3.1 ALL HANFORD ORGANIZATIONS AND PERSONNEL

All Hanford Site employees must notify the WIDS Database Administrator, currently Bechtel Hanford, Inc. (BHI) Data Management, about new potential sites and new information about existing sites; please call the WIDS hotline at 375-WIDS or send a cc:Mail™ message to ^WIDS Investigation Team. Employees are responsible for using any internal channels their respective organizations may have to report such information. Non-Hanford employees can either call the hotline or notify DOE of new potential sites and new information about existing sites.

3.2 ORGANIZATION REQUESTING SITE RECLASSIFICATION

The organization requesting a site reclassification action will collect and evaluate all data associated with the site reclassification. The justification for the request for site reclassification will be entered on the Waste Site Reclassification Form (Figure 3-1); the form will be transmitted to the Tri-Parties for their review and approval (Table 2-3).

3.3 TRI-PARTY AGREEMENT PARTIES

The U.S. Department of Energy, Richland Operations Office (RL), the U.S. Environmental Protection Agency (EPA), and/or the Washington State Department of Ecology (Ecology) will be responsible for reviewing the request for waste site reclassification and, if acceptable, signing the Waste Site

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Reclassification Form. Any party that will not sign the form must explain why the site cannot be reclassified.

3.4 DATABASE ADMINISTRATOR

The Database Administrator is responsible for maintaining WIDS. The Database Administrator is responsible for establishing internal procedures for accepting information about new sites, site changes and for ensuring that changes to the database are complete, accurate, and within the established database criteria. These procedures are included in BHI-EE-09, Environmental Data Management Procedures and can be found on the "WEB" through the ERC Intranet pages. Some of the QA/QC procedures are that all information is traceable to a referenced source document. When conflicting information is available, multiple information and sources are presented. WIDS has both automated and manual data change control. Hard copy data change forms are used to request the change and require approval before the change is implemented. Data change forms are maintained in the WIDS hard copy files. Any changes to the data are automatically logged to a change log table that contains the before change image of the data, after change image of the data, date of the change, and name of the person making the change. The data is reviewed by at least one other person besides the person entering the data. Project oversight is performed through the reviews conducted by project personnel. This person is also responsible for ensuring that the database information is accessible to Ecology and EPA, as required in the Tri-Party Agreement Action Plan, and to Hanford Site contractors.

4.0 REQUIREMENTS

4.1 NOTIFICATION

Section III.A.2.i of the Hazardous and Solid Waste Amendments (HSWA) portion of the Hanford RCRA operating permit provides the following:

"Notification of newly identified solid waste management units within these areas of the facility covered by the Tri-Party Agreement shall be in accordance with Section 3.0 of

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the Tri-Party Agreement Action Plan."

Section 3.0 of the Tri-Party Agreement Action Plan (Subsection 3.5) addresses notification of new sites by establishing WIDS as the system to identify all waste management units, by requiring the database to be current, and by requiring that the database be available to the EPA and Ecology.

4.2 WASTE INFORMATION DATA SYSTEM (WIDS)

The Tri-Party Agreement Action Plan establishes WIDS as the Tri-Party Agreement waste management unit inventory and tracking system (Subsection 3.5). Furthermore, the Tri-Party Agreement Action Plan requires the database to always be updated. Subsection 3.5 establishes that the database will describe the current status of each unit and refers to a database change control procedure to document and trace all changes dealing with the current status of a unit. This procedure formalizes the database change control system required in the Tri-Party Agreement and is consistent with the following:

- Subsection 7.2.1 of the Tri-Party Agreement Action Plan addresses sitewide, ongoing scoping activities. This section states that the sitewide scoping activity may reveal additional or new information that could impact either the designation of individual units within operable units or the priority in which operable units will be managed. Subsection 7.2.1 refers to WIDS as the primary vehicle to document this ongoing scoping activity.
- RCRA Corrective Action Proposed Rule (55 FR 30798) identifies the RFA as the first step in the RCRA corrective action process and is analogous to the PA/SI stage of the CERCLA program (§300.420). The RFA serves as a screen to (1) identify solid waste management units that require further action and (2) eliminate solid waste management units, environmental media, or entire facilities from further consideration where it is determined that there is no evidence of a release or likelihood of a release that poses a threat to human health and the environment. The waste site evaluation

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process described in this procedure is equivalent to the process conducted under an RFA or PA/SI.

WIDS is an electronic database backed up by hard copy data packages that contain supporting documentation and references for all sites entered into WIDS regardless of their classification (e.g., accepted, rejected, discovery). The WIDS sites and/or information are not deleted from the database or the hard copy backup files. Some information on waste management units can also be found in the Administrative Record. Requests for reference materials can be made through the Administrative Record. A WIDS hotline, 375-9437, has also been established for waste site inquiries or to report information on a new or existing waste site. The WIDS hard copy files are managed per BHI procedure BHI-EE-09 and are maintained at 3350 George Washington Way.

5.0 PROCEDURE

5.1 DISCOVERY OF A POTENTIAL NEW SITE OR NEW INFORMATION

Anyone that has discovered a potential new site or has discovered new information on an existing site should complete an Environmental Site Information Form (Figure 5-1) and return it to the WIDS Database Administrator. If the change involves multiple sites described in a single technical document, complete a single form and enclose the document with the form.

NOTE: This step is satisfied if the change(s) is in a document, such as a field investigation report, that is published periodically and routinely routed to the Database Administrator.

New information could change the classification of a site.

5.2 RL AND REGULATOR REVIEW OF DISCOVERY SITES

Newly discovered sites that are proposed to be rejected (i.e., determined not to be a waste management unit) or that have

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been in the discovery classification for more than 6 months will be periodically reviewed (as described below) by the Tri-Parties to ensure that the site is appropriately classified.

1. The Database Administrator will attach to the Project Managers' Status Package a list of sites that are proposed to be rejected during that given month and a list of sites in the discovery classification for more than 6 months. The Database Administrator will also provide the Project Managers the WIDS discovery site evaluation checklist and general summary sheet for the site(s) undergoing review. The Project Managers' Status Package is provided for review during the Project Managers' meeting.
2. The Project Managers will have 60 calendar days from the date of the Project Managers' meeting to review the proposed classification. The Project Managers can request additional information from the Database Administrator. The Project Managers will document agreements reached on site classification on the discovery site evaluation checklist, which will be included in the Project Managers' meeting minutes. The Database Administrator will update the database (Section 5.2.1) and place a copy of the discovery site evaluation checklist in the WIDS data package for the site.
3. The Project Managers will elevate the classification of a site to the Inter-Agency Management Integration Team (IAMIT) for resolution if agreement cannot be reached within 60 calendar days of the Project Manager's meeting. During this resolution period, the Database Administrator will "flag" any sites proposed to be rejected as a discovery site. The IAMIT will document agreements reached on site classification on the discovery site evaluation checklist, which will be included in the meeting minutes. The Database Administrator will update the database (Section 5.2.1) and place a copy of the discovery site evaluation checklist in the WIDS data package for the site.

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4. Sites for which the Project Managers agree should remain in the discovery classification, will only be reviewed again after additional information is obtained. The review process can be initiated by sending the new information to the Database Administrator.

5.3 RECLASSIFICATION TO REJECT OR NO ACTION

The following describes the process for reclassification of accepted sites (waste management units) to rejected or no action.

1. Anyone proposing to reclassify a waste management unit to rejected or no action (Table 2-2) should review the reclassification logic in Figure 2-1 and complete a Waste Site Reclassification Form (Figure 3-1). The Waste Site Reclassification Form and appropriate supporting documentation (Table 2-3) should be provided to the Database Administrator and the responsible RL Project Manager.
2. The RL Project Manager responsible for the waste management unit will transmit (via a letter) the reclassification form and supporting documentation to the lead regulatory agency Project Manager. The RL Project Manager should notify the lead regulatory agency Project Manager of the transmittal.
3. The regulatory agency Project Manager will have 60 calendar days to review the package. Comments should be provided to the RL Project Manager with a copy being provided to the Database Administrator. Recommendations from the regulators not to reclassify a waste management unit should include a justification for a different classification.
4. If no comments are received within 60 days, and no request for extension has been made, the reclassification will be submitted to the IAMIT for resolution. The Database Administrator will then update the classification in the WIDS database (Section 5.2.2).

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5. If comments are received, the RL Project Manager reviews the regulator comments. The RL Project Manager will either notify the Database Administrator that the waste management unit will be reclassified, will not be reclassified based on regulator comments, or will set up a meeting with the commentor to further discuss the reclassification.
6. The meeting to discuss the reclassification will be held within 30 calendar days of receiving regulator comments. The Project Managers will document the meeting conclusions in meeting minutes signed by the Project Managers. The RL Project Manager will send the signed meeting minutes to the Administrative Record and the Database Administrator. The Database Administrator will include the meeting minutes with the data package for the site and will update the database, as appropriate (Section 5.2.2).
7. The Project Managers will elevate the reclassification to the IAMIT for resolution if agreement cannot be reached within 30 calendar days after receipt of the regulatory agency Project Manager's comments. The IAMIT will document agreements reached on reclassification in meeting minutes. The Database Administrator will update the database (Section 5.2.1) and place a copy of the meeting minutes in the WIDS data package for the site.

The following are examples of waste management units that could be proposed to be reclassified as rejected or no action.

Reject: Scattered debris (e.g., car bodies, metal springs, buckets) resulting from pre-Hanford historical residential activities. This type of site does not meet the definition of a waste management unit and should therefore not be identified in the WIDS as an "accepted" site.

No Action: A cistern used to store drinking water. The site was never used to store a hazardous substance and would therefore not require further action under RCRA or CERCLA.

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5.4 RECLASSIFICATION TO CLOSED OUT

Anyone proposing to reclassify a waste management unit to closed out (Table 2-2) should review the reclassification logic in Figure 2-1 and complete a Waste Site Reclassification Form (Figure 3-1). The Waste Site Reclassification Form and appropriate supporting documentation (Table 2-3) should be provided to the Database Administrator and the responsible RL Project Manager.

RL will obtain the appropriate signatures on the form (Table 2-3) and return to the originator and the Database Administrator. The Database Administrator will update the database to identify that the waste management unit has been closed out (Section 5.5.2).

Table 2-3 identifies examples of waste management units that would meet the definition of closed out. One example is an old spill of contaminated liquid along a roadway that was previously cleaned up. A recent field investigation determined that no hazardous substances are present above cleanup standards identified in a Record of Decision.

5.5 DATABASE ADMINISTRATION

5.5.1 New Sites and New Information

The following summarizes the procedures, as defined by BHI-EE-09, used by the Database Administrator to accept, investigate, and verify information about new sites and new information on existing sites.

1. Upon receipt of the Environmental Site Information Form, determine if the site has been previously documented by cross-checking with WIDS and/or the Hanford Geographical Information System (HGIS), and assign it to a WIDS data management investigator, if necessary.
2. Investigate the new information and collect additional data, if necessary, to document a change in WIDS. Depending on the nature of the change, this may include

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site visits, interviews, photography, review of technical documents, and determination of precise coordinates.

3. Prepare preliminary revisions to WIDS based on new information, and prepare a hard copy data package to include documents gathered in Step 2 and submit to the Database Administrator.
4. Evaluate the site against regulatory criteria to determine the site classification using the Discovery Site Evaluation Checklist (Figure 5-2). Note the appropriate regulatory authority (e.g., RCRA Corrective Action, Septic System Regulation, etc.) that applies to the site in the comments section. Conduct a technical review of the hard copy data file and preliminary revisions to WIDS. Resolve any issues and validate the revision to WIDS.
5. Assign the waste management unit to the operable unit in which it is located or to the nearest operable unit or waste site grouping. Waste management units requiring action under RCRA Corrective Action or CERCLA will be designated as RPP or CPP consistent with the operable unit to which the waste management unit is assigned.
6. If validated in Step 4 and approved by the Database Administrator, revise WIDS accordingly.
7. Place the hard copy data package in a secure data file.
8. Provide written feedback to the person who provided the new information about the site.

5.5.2 Waste Site Reclassification

The following summarizes the procedures used by the Database Administrator to process the Waste Site Reclassification Form.

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1. Verify receipt of the Waste Site Reclassification Form and that the form contains all pertinent information and signatures.
2. Update WIDS by changing the classification of the site, as indicated on the Waste Site Reclassification Form, and updating all information pertaining to the reclassification.

6.0 REFERENCES

55 FR 30798, 1990, "Corrective Action for Solid Waste Management Unit (SWMUs) at Hazardous Waste Management Facilities, USEPA, Proposed Rule," *Federal Register*, pp. 30798-30810, (July 27).

Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq.

Ecology, EPA, and DOE, 1989, *Hanford Federal Facility Agreement and Consent Order*, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington.

Resource Conservation and Recovery Act of 1976, as amended, Public Law 94-580, 90 Stat. 2745, 42 U.S.C. 6901, et seq.

Washington Administrative Code 173-303-040, 1993, "Dangerous Waste Regulations", as amended.

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Table 2-1. Newly Discovered Site Classification Categories.

Site Classification Categories	Description
Rejected	Assessment that the site is not a waste management unit and not within the scope of the Tri-Party Agreement (Section 3.0).
Discovery	Evidence of the potential existence of a waste management unit; assessment not yet complete.
Accepted	Assessment that the site is a waste management unit as defined in the Tri-Party Agreement (Section 3.0).

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Table 2-2. Reclassification Categories.

Site Reclassification Categories	Description
Rejected	An assessment that the site is not a waste management unit and there is no evidence of an actual or potential hazardous substance release.
No Action	A determination that the waste management unit does not require action under RCRA Corrective Action, CERCLA, or other regulatory authority.
Closed Out	An assessment that the waste management unit now meets cleanup standards or other regulatory closure requirements.
Deleted from NPL	The waste management unit is included in a final action published in the Federal Register to delete a listing from the National Priorities List.

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**Table 2-3. Examples of Reclassification Changes
Actions and Formal Documentation Required.**

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Type of Reclassification Changes Action	Documentation Required
Remediation - Closed Out (including interim or final CERCLA response actions and RCRA corrective actions; site has been remediated to meet cleanup standards specified in the ROD, or no action is required to meet cleanup standards specified in the ROD).	Waste Site Reclassification Form signed by the Tri- Parties with completed verification package, closeout report, or certification of completion referenced (regulator concurrence with these documents eliminates the need for signatures on the form). The form should indicate if the site requires periodic review.
RCRA TSD Closure - Closed Out 1. Clean Closure - closed to the cleanup levels prescribed by WAC 173-303-610(2)(b). 2. Modified Closure - closed in accordance with the <i>Hanford Facility Wide Resource Conservation and Recovery Act</i> Permit condition II.J and II.K. 3. Landfill Closure - a unit that has been closed in accordance with WAC 173-303- 665. 4. Procedural Closure - determined to have never managed hazardous waste.	Waste Site Reclassification Form with Certification of Closure Acceptance Letter or written concurrence for procedural closure signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form). The form should indicate if the waste management unit requires post-closure monitoring.

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**Table 2-3. Examples of Reclassification Changes
Actions and Formal Documentation Required.**

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Type of Reclassification Changes Action	Documentation Required
Petroleum UST - Closed Out (Petroleum USTs established to be abandoned before December 22, 1988 may be closed out through WAC 173-360 or in accordance with Section 7.0 of the Tri-Party Agreement.	Waste Site Reclassification Form noting the waste management unit has been closed in accordance with WAC 173-360 with the supporting documentation referenced (UST Closure and Site Assessment Notice, UST Site Check/Site Assessment Checklist, and as appropriate, the independent cleanup action report submitted to Ecology). RL signature is required on the form.
Septic System - Closed Out	Waste Site Reclassification Form noting that the septic system has been permanently removed from service by removing the septage and reporting to the local health officer, and that the lid has been removed or destroyed and the void filled with soil, as required by WAC 247-272- 18501. RL signature is required on the form.
Underground Injection Well and State Waste Discharge Permitted Site - Closed Out (WAC 173- 216/218)	Waste Site Reclassification Form noting that the discharge to the waste management unit has ceased, the waste management unit has been reviewed, and there is no potential for hazardous substances to have been released to the soil. Supporting documentation on the evaluation to be referenced or attached. RL signature is required on the form.

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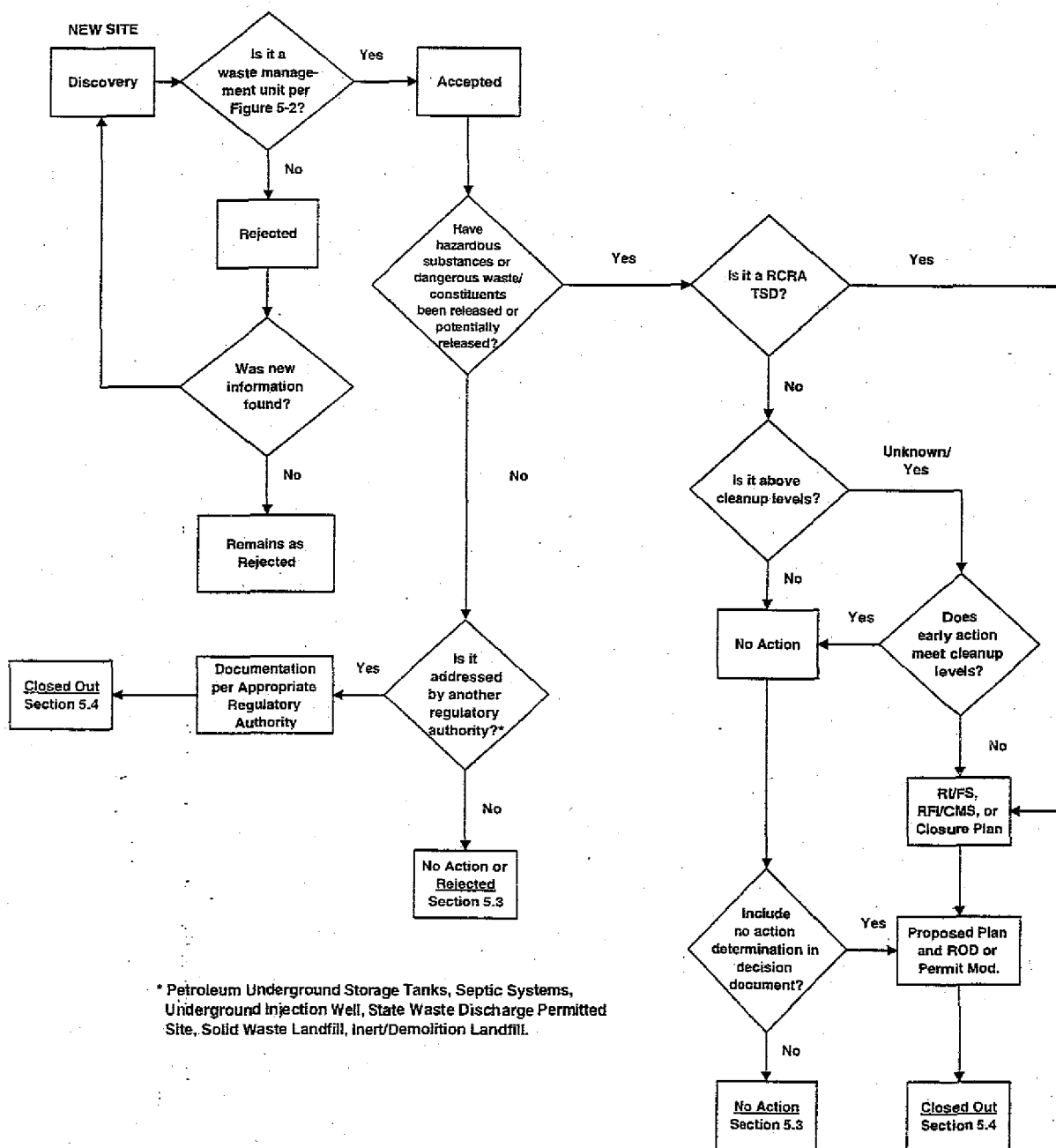
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**Table 2-3. Examples of Reclassification Changes
Actions and Formal Documentation Required.**

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Type of Reclassification Changes Action	Documentation Required
Solid Waste Landfill - Closed Out	Waste Site Reclassification Form with Certification of Closure Acceptance Letter signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form).
Inert/Demolition Waste Landfill - Closed Out	Waste Site Reclassification Form noting that waste management unit has been closed per WAC 173-304-461. RL signature is required on the form.
Facility - Closed Out	Waste Site Reclassification Form with appropriate closeout documentation referenced. RL signature is required on the form.
No Action (Does not require action under CERCLA, RCRA Corrective Action, or other regulatory authority)	Waste Site Reclassification Form signed by the Project Managers, with the supporting documentation attached.
Rejected	Waste Site Reclassification Form signed by the Project Managers, with supporting documentation attached.

Figure 2-1. Waste Site Classification/Reclassification Flow Diagram.



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<u>Date Submitted:</u>		WASTE SITE RECLASSIFICATION FORM		<u>Control Number:</u>	
Originator:		<u>Operable Unit(s):</u>			
Phone:		<u>Waste Site ID:</u>			
		<u>Type of Reclassification Action:</u>			
		Rejected <input type="checkbox"/> Closed Out <input type="checkbox"/> No Action <input type="checkbox"/>			
<p>This form documents agreement among the parties listed below authorizing classification of the subject unit as rejected, closed out, or no action and authorizing backfill of the waste management unit, if appropriate. Final removal from the NPL of no action or closed-out waste management units will occur at a future date.</p>					
<u>Description of current waste site condition:</u> (Summarize status of investigation/remediation of the waste sites.)					
<u>Basis for reclassification:</u> (For closeout, reference supporting documentation, as listed in Table 2-3.)					
DOE Project Manager		Signature		Date	
Ecology Project Manager		Signature		Date	
EPA Project Manager		Signature		Date	

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Figure 5-1. Environmental Site Information Form.

1. Do you believe this to be a previously documented site? <input type="checkbox"/> Yes <input type="checkbox"/> No		
2. If you answered "yes" to question 1, what is the site's code, identification number, or name?		
3. If you answered "no" to question 1, what is the location of the site? Be as specific as possible and include access instructions. Sketch, if necessary.		
4. If you answered "no" to question 1, provide a general description of the site. If you answered "yes," provide new or updated information about the site.		
Your Name:	Phone:	Date:

Upon completion, return by Plant Mail to the **WIDS Database Administrator** at **H0-20**.

Shaded areas for office use only.

Verification of Receipt by WIDS Database Administrator	
Signature:	Date:

Evaluation by WIDS Data Management Personnel	
Is this a new site (i.e., one that has not previously been documented and does not currently exist in the waste sites database)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If no, does any information need to be added to, or changed in, the database? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Signature:	Date:

Figure 5-2. Discovery Site Evaluation Checklist

(To be completed by a member of WIDS Data Management Staff and included with the data package for a newly discovered potential waste management unit.)

Discovery Site ID Number:	Waste Management Unit <input type="checkbox"/>
Site Alias(es):	
	Not a Waste Management Unit <input type="checkbox"/>
	More Information Needed <input type="checkbox"/>
1. Does the unit only receive uncontaminated rainwater runoff? (Yes/No) IF YES, CHECK "NOT A WASTE MANAGEMENT UNIT" ABOVE AND STOP. IF NO, GO TO 2.	
A check in any "YES" box below indicates the site is a waste management unit, as defined in Section 3.1 of the Tri-Party Agreement and should be entered into WIDS. (Items 2 through 7 below correspond with the six waste management unit types found in the Tri-Party Agreement definition.)	YES NO <input type="checkbox"/> <input type="checkbox"/>
2. Complete items 2.a through 2.f. below to determine if the unit is a solid waste management unit (SWMU), as specified under WAC 173-303-040.	
2.a. Is the material at the unit a waste (i.e., a regulated waste or a discarded material, including garbage, refuse, sludge, construction/demolition debris, industrial/sanitary wastewater or other discarded solid, liquid, semisolid, or contained gas)? (Yes/No) IF NO, CHECK NO AND GO TO 3. IF YES, GO TO 2.b.	
2.b. Is the waste from historical residential activities (i.e., not from industrial, commercial, mining, agricultural, or community activities)? (Yes/No)	
2.c. Is the unit an industrial wastewater point discharge permitted under the <i>Clean Water Act</i> (i.e., National Pollutant Discharge Elimination System permit)? (Yes/No)	
2.d. Does the waste consist <u>only</u> of source, special nuclear, or byproduct material regulated by the <i>Atomic Energy Act</i> ? (Yes/No) A YES TO ANY OF THE ABOVE QUESTIONS INDICATES THE SITE IS NOT A SWMU. IF SO, CHECK NO AND GO TO 3. IF ALL ARE NO, GO TO 2.e.	
2.e. Was the waste placed in a discernable unit (i.e., a landfill, surface impoundment, land treatment unit, waste pile, tank, container storage area, incinerator, injection well, wastewater treatment unit, waste recycling unit, or other physical, chemical, or biological treatment unit)? (Yes/No) IF YES, CHECK YES AND GO TO 3. IF NO, GO TO 2.f.	
2.f. Is the unit the result of routine and systematic discharges (i.e., areas receiving small but steady discharges over time from systematic human activity, such as from loading/unloading operations, solvent washing, industrial process sewer systems, etc.)? (Yes/No) IF YES, CHECK YES. IF NO, CHECK NO. GO TO 3.	

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	YES	NO
3. Is the unit a waste disposal unit (Complete items 3.a and 3.b below)?	<input type="checkbox"/>	<input type="checkbox"/>
3.a. Does the unit require a RCRA permit to dispose of dangerous or mixed waste? (Yes/No)		
3.b. Have hazardous waste or substances been disposed of in a burial ground, pit, pond, ditch, crib, trench, french drain, or land surface that is not subject to regulation as a RCRA disposal unit and may require action to mitigate a potential environmental impact (e.g., radioactive waste disposal units, pre-RCRA units)? (Yes/No)		
IF EITHER IS YES, CHECK YES. IF BOTH ARE NO, CHECK NO. GO TO 4.		
4. Is the unit an unplanned release that has not been adequately cleaned up and represents a potential threat to human health or the environment (i.e., releases above CERCLA reportable quantities defined in 40 CFR 302.4; other hazardous substance releases, including petroleum, that may require action to mitigate a potential environmental impact)?	<input type="checkbox"/>	<input type="checkbox"/>
5. Is the unit an inactive, contaminated structure?	<input type="checkbox"/>	<input type="checkbox"/>
6. Does the unit require a RCRA permit to treat or store dangerous or mixed waste?	<input type="checkbox"/>	<input type="checkbox"/>
7. Is the unit another type of storage unit that may require action to mitigate a potential environmental impact (e.g., radioactive waste storage unit)?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:		
WIDS Data Management Investigator	Date	
Regulatory Compliance Concurrence	Date	
FOR SITES REQUIRING DOE-RL AND REGULATOR REVIEW PER SECTION 5.2		
DOE-RL Concurrence	Date	
Lead Regulatory Agency Concurrence	Date	